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No. 92-6281

In the
SUPREME COURT OF THE UNITED STATES
October Term, 1992

ROBERT P. HAGEN,

Petitioner,

v.

STATE OF UTAH,

Respondent.

ON WRIT OF CERTIORARI TO THE
UTAH SUPREME COURT

BRIEF FOR ROOSEVELT CITY AS AMICUS CURIAE IN SUPPORT OF RESPONDENT STATE OF UTAH

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BRIEF FOR ROOSEVELT CITY AS AMICUS CURIAE IN SUPPORT OF RESPONDENT STATE OF UTAH

INTEREST OF AMICUS CURIAE

Roosevelt City is the largest and most densely populated of the non-Trust and predominantly non-Indian communities and municipalities within the historic exterior boundaries of the Uintah Valley Reservation portion of what is known today as the Uintah and Ouray Indian Reservation. Roosevelt City is the economic hub of the

area at issue and provides crucial public and private services to the surrounding communities and county enclaves, including the predominantly Indian and Ute Tribal communities of Fort Duchesne, Whiterocks, and Randlett (which are located on Indian Trust Land).

The purpose of this amicus curiae brief is not to restate the sound legal arguments of the State of Utah and the local Counties (which arguments this amicus curiae fully supports), however, it is to illustrate and emphasize the key geographic, demographic, and problematic realties of the area at issue. Indian and non-Indian relations have been relatively genuine and peaceable over the years, and it is not the intent of Roosevelt City to strain relations any further. It is the City's intent to merely describe actual characteristics and conditions. The Court should refer to the enhanced portion of a Bureau of Land Management Land Status Map attached to this brief as Appendix A for its review and careful study in understanding the area in question and the adverse impact this jurisdictional boundary issue has on the 85 percent majority non-Indian population. See also JA 185.

SUMMARY OF ARGUMENT

From late 1905 until the mid-1980s, non-Indian settlers and immigrants populated the Uintah Valley[1] with the understanding, expectation and the precedent-setting

[1] This name reference shall be used for the convenience of the Court. Local residents commonly refer to the area as the "Uintah Basin" as a result of certain geological characteristics unique to the area.

legal conclusion that the land they had settled and local economy they had developed was not within an Indian Reservation or governed jurisdictionally by the Ute Tribe. Non-Indian residents have relied on that understanding and expectation for over four generations. The non-Indian population is now more than five times that of the Indian population and has established municipalities, communities, infrastructure, and an economic base responsibly serving the entire area. Extending the jurisdictional boundaries of the Reservation so as to envelope over 1.4 million acres of non-Trust Land (70 percent of all the land in the Uintah Valley) and those communities settled, developed, owned, and governed by the non-Indian majority, and placing Roosevelt City, as well as all the other non-Indian communities, within the jurisdictional realm and governing powers of the Ute Tribe, is contrary to sound public policy and contrary to basic principles of democracy.

ARGUMENT

I. Important Geographic and Demographic Factors Manifest the Federal Government's Intent for Diminishing the Original Reservation Boundary and Justify a Sound Public Policy Reason to Decide in Favor of Diminishment.

The area at issue is located in Northeastern Utah and within what was originally known and set apart (in 1861) as the Uintah Valley Reservation--the western portion of what is referred to today as the Uintah and

Ouray Reservation (see App. A, Map). After these lands were allotted to the Indians and opened for non-Indian homesteading as public domain in 1902 through 1905, the intentions of the Federal Government were manifest and expectations of settlers and the Indians set into motion.[2]

Congressional intent is of paramount importance in determining the diminishment issue in this case. In determining such intent, the consideration of relevant geographic and demographic information is imperative. This information manifests the overall understanding and expectations of the local residents and businesses, as well as the degree of reliance on that understanding. This Court in Solem v. Bartlett, 465 U.S. 463 (1984), referred to the importance of such information by using the following standard of consideration:

> ....When events surrounding the passage of a surplus land Act ...unequivocally reveal a widely held, contemporaneous understanding that the affected reservation would shrink as a result of the proposed legislation, we have been willing to infer that Congress shared the understanding that its action would diminish the reservation, notwithstanding the presence of statutory language that would otherwise suggest reservation boundaries remained unchanged.... [W]e look to the subsequent demographic history of opened lands as one additional clue as to what Congress expected would happen once land on a particular reservation was opened to non-Indian settlers.

Id. at 471-72. See also, Rosebud Sioux Tribe v. Kneip, 430 U.S. 584, 587 (1977).

This Court, in deciding in favor of diminishment in Rosebud, was emphatic about the disputed area's demographic characteristics:

> The long-standing assumption of jurisdiction by the State over an area that is over 90% non-Indian, both in population and in land use, not only demonstrates the parties' understanding of the meaning of the Act, but has created justifiable expectations which should not be upset by so strained a reading of the Acts of Congress as petitioner urges. We are simply unable to conclude that the intent of the 1904 act was other than to disestablish.

Rosebud, 430 U.S. at 604-05 (emphasis added). As will be shown hereafter, the demographic and geographic situation of the Uintah Valley is as demonstrative and obvious as that in Rosebud. By contrast, this Court, in finding against diminishment in Solem, made it a point of emphasis in support thereof that the Cheyenne River Sioux Tribe had a strong and responsible presence in the disputed

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[2] Reference is made to the following Acts of Congress, dealt with in greater detail in the State of Utah's brief and in State v. Perank, 191 Utah Adv. Rep. 5 (1992): 32 Stat. 245, Act of May 27, 1902 (Uintah Act); 32 Stat. 982, Act of March 3, 1903; 33 Stat. 189, Act of April 21, 1904; 33 Stat 1048, Act of March 3, 1905; and Presidential Proclamation of July 14, 1905, 345 Stat. 3119, III Kapp. 605 (1913).

area--such as the largest proportion of the overall population, effective law enforcement services and social services, and as being an area of obvious Indian character and semblance. Solem, 465 U.S. at 480.

The Indian lands of the Uintah Valley became known as the Indian Trust Lands, amounting to approximately 566,000 acres or 27.7 percent of the current land holdings (see App. A, Map). "Checkerboarding"[3] is not a problem in the Uintah Valley, whereas the Trust Lands are, for the most part, concentrated into well-defined areas and have become, over the last eighty years, easily recognized and quite well known to non-tribal managers and officials (App. A, Map).[4] The northern section of Trust Lands are concentrated in the largely unpopulated canyon mouths and foothills of the Uinta Mountains, bordered on the north by the vast Ashley National Forest and High Uintas Primitive Area. The central and southern sections of Trust Lands are also concentrated along water courses and tributaries and in largely unpopulated areas, except for the small and clearly defined Ute Indian communities of Fort Duchesne, Whiterocks, and Randlett, located on Trust Lands.[5] The remaining 72.3 percent of the Uintah Valley is comprised of approximately 400,000 acres of patented fee lands; a 1,010,000-acre forest reserve; a 56,000-acre Strawberry River Reclamation reserve; and a 7,040-acre Gilsonite Strip reserve. Of course, the 400,000 acres of fee lands are at the heart of this jurisdictional controversy.

In mid-1905 and pursuant to the 1902 Act as amended, Theodore Roosevelt proclaimed that the unallotted Indian lands be "restored to the public domain" and be opened up for homesteading and the establishment of townsites. Presidential Proclamation of July 14, 1905, 34 Stat. 3119-20. Not unlike most of the more than twenty

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[3] "Checkerboard" land patterns are generally just as the name implies. "Checkerboard jurisdiction is the colloquial name given to a pattern of jurisdiction in which the jurisdictional status of the land varies from parcel to parcel. It arises, naturally, in the context of an Indian reservation, where state, federal, and tribal jurisdictions are intermingled." Confederated Tribes v. County of Yakima, 903 F.2d 1207, 1216 (9th Cir. 1990). A more typical example of an actual checkerboard pattern are the Utah State school trust lands, which make this type of pattern in the Uintah County/Uncompahgre Reservation area (see App. A, Map).

This Court has allowed checkerboard jurisdiction "to stand in cases such as DeCoteau v. District County Court, 420 U.S. 425, 95 S.Ct. 1082, Rosebud Sioux Tribe v. Kneip, 430 U.S. 584, 97 S.Ct. 1361, and United States v. Pelican, 232 U.S. 442, 34 S.Ct. 396, 58 L.Ed. 676 (1914)." Pittsburgh & Midway Coal Min. Co. v. Yazzie, 909 F.2d 1387, 1421 (10th Cir. 1990). This Court also "in Montana and Brendale authorized such 'checkerboard' jurisdiction by mandating that neighboring tracts of land be subject to different regulatory authorities on the basis of type of ownership, or nature of the land." State of South Dakota v. Bourland, 949 F.2d 984, 996 (8th Cir. 1991). In fact, the Court has held that "checkerboard jurisdiction is not novel in Indian law, and does not, as such, violate the Constitution." Washington v. Yakima Indian Nation, 439 U.S. 463, 502 (1979).

[4] In fact, the Ute Tribe posts signs identifying their Trust Lands at many publicly accessible locations.

[5] Whereas the headquarters and governmental agencies for the Ute Tribe are located in Fort Duchesne, the area's Indian population is concentrated in and around these three communities. The populations of these communities are 665, 312 and 283 respectively. U.S. Department of Commerce, Bureau of the Census, 1990 Census of Population and Housing, Summary Population and Housing Characteristics: Utah, 1990 CPH-1-46, Table 15, p. 69. These communities are comprised of predominantly Ute Tribal members.

non-Indian settlements in the Uintah Valley, the townsite of Roosevelt City was first settled in late 1905. Roosevelt City is located near the border of Duchesne and Uintah Counties and on U.S. Highway 40. Like Roosevelt City, all of the other non-Trust Land communities in this region are predominantly, if not entirely, non-Indian and located separate and apart from the Indian Trust Lands, and along state and county-funded and maintained highways and roadways (App. A, Map). The Uintah Valley area has an 85 percent non-Indian population and a 15 percent Indian population. U.S. Department of Commerce, Bureau of the Census, 1990 Census of Population and Housing, Summary Population and Housing Characteristics: Utah, 1990 CPH-1-46, Table 17, p. 73.[6] This almost 5:1 population ratio is more than reflective of the land use and economic makeup of the area. To illustrate, of Roosevelt City's 3,915 population, 7.5 percent or less is comprised of Indians.[7] Similar scenarios exist in nearly all of the other area communities located on the non-Trust Lands.[8]

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[6] The 1990 Census shows a 14,574 non-Indian population and 2,650 Indian population. This Indian population figure includes those Indians who are Ute Tribal members. Therefore, a greater population disparity presumably exists when concerning non-Tribal versus Tribal members. The Ute Tribe will not disclose actual Tribal Membership figures to this amicus curiae, despite several requests for such information. However, current estimates suggest a non-Indian population of approximately 18,000 and Indian population of 3,000. No matter which set of numbers are used, the population percentages and ratios remain about the same.

[7] Id. at Table 15, p. 68, and Table 3, p. 13.

[8] For example, Duchesne City (1,308 pop.) has a less than 1 percent Indian population; the town of Neola (511 pop.) has a 12.5 percent Indian population; the town of Altamont (165 pop.) has a 3.5 percent Indian population; and Myton City (468 pop.) has an 18 percent Indian population. Again, very few of these Indians are Ute Tribal members. Id. at Table 3, p. 13.

Unlike the small Indian population concentrated in a very small area of the Indian Trust Lands, the much larger non-Indian population is concentrated throughout the 400,000 acres of fee land.[9] The fee-land area has been gradually, over the years, developed and covered with farms, ranches, oil and gas production facilities, water treatment and conveyance facilities, recreational facilities, and airport facilities--in addition to the municipalities dotting the area. The patented fee-land area has a population density of approximately 23 persons per square mile (27.4 acres per person), whereas the Indian Trust Land area has a population density of only 3 persons per square mile (213.6 acres per person).

The whole area relies heavily on and is driven by the oil and gas industry for its tax base and a large amount of its employment.[10] The Pennzoil Oil Refinery, one of the largest private employers in the area, is located adjacent to the City. Roosevelt City is the most substantive commercial and business sector of the Uintah Valley. Of the 350 businesses and industries in Roosevelt, only two are known to be owned and operated by Ute Tribal

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[9] The non-Indian population on the fee land area alone is approximately 91 percent of the total population. Id. at Table 13, pp. 13 and 16 (for Duchesne and Uintah Counties).

[10] The Ute Tribe is greatly dependent upon lease royalties and revenues and Roosevelt City's business sector to support its government agencies and its members.

members.[11] Non-agricultural employment is concentrated in the oil and gas industry, trade, and government sectors. Utah Dept. of Employment Security, Labor Market Information and Research, Summary of Key Labor Market Information For Utah, p. 16 (July 1992). The area's Indian population makes up about 10 percent of the total employed labor force and 35 percent of the total unemployed labor force. U.S. Department of Commerce, Bureau of Census, 1990 Census of Population and Housing, Summary Tape File 3A. Of this population's own 798-person labor force, 29 percent (228) are unemployed. Id.

The public and private sectors of Roosevelt City, Duchesne County, and Uintah County, provide most of the public services and facilities for the entire non-Trust Land area and some of the Trust Land area--such as roads, water, sewer, electricity, health care, education, recreation, fire protection, and law enforcement.[12] Whereas Roosevelt City is the largest commercial sector in the area, tribal members do much of their commercial business activities (shopping, banking, entertainment, etc.) in Roosevelt City. Roosevelt City's public and private services and facilities are provided for all area residents, including Ute Tribal members. Tribal members are not required to and generally do not pay State sales tax, nor do they pay property taxes on Trust-held Lands. Roosevelt City provides fire

[11] These two businesses are on-premises liquor establishments. Most of the Ute Tribe member-owned and operated businesses are located primarily in or around Fort Duchesne and on Trust Lands.

[12] The Ute Tribe provides most of its own public services to its members on Trust Lands, funded by the Ute Tribe or Federal Government.

protection on Indian populated Trust Lands, for very little remuneration from the Ute Tribe. Roosevelt City's Police Department provides law enforcement assistance to the Ute Tribe and Bureau of Indian Affairs; however, since the decision to expand the Reservation boundary, the City has the greater burden of handling crimes and offenses by tribal members who take full advantage of the commercial and retail services provided in the City, discussed infra.

Strikingly similar to the factual situations in the Rosebud and DeCoteau v. District County Court, 420 U.S. 425 (1975), decisions of this Court, the geographical and demographic character of the Uintah Valley area manifests the long-held non-Indian population's understanding and "justifiable expectation" that the fee lands would be governed by State and local townsite governments. See Rosebud, 430 U.S. at 605; DeCoteau, 420 U.S. 425, 428 (1975). The 85 percent non-Indian majority has populated, developed and governed the entire 400,000-acre disputed portion of the Uintah Valley, whereas the remaining 15 percent Indian population has governed and occupied a tremendously small portion of its extensive land holdings. The distinction between the Trust and non-Trust lands has been apparent and notorious for over 80 years. The non-Indian majority has relied on State and local authority to govern the non-Trust lands by investing their lives and a tremendous amount of public and private funds for quality services and facilities, and in the development of a viable local economy and attractive living environment. The adverse and burdensome consequences of changing time-honored State and local rule over non-Trust Lands, occupied and owned by a non-Indian majority, should be obvious. However, the Court should be aware of the problems existing for this amicus curiae since

the Tenth Circuit's decision to expand the historic Reservation boundary.

II. Burdensome Consequences Have Been the Practical Impact of the Tenth Circuit's Decision to Expand the Reservation Boundary to Its Historical Extent.

The United States District Court in Ute Indian Tribe v. State of Utah, 521 F. Supp. 1072 (D.C. Utah 1981), expressly acknowledged the "important implications for the allocation of jurisdiction" among the several public authorities in the Uintah Valley. Id., at 1156. However, the Court simply underestimated the seriousness of those implications. The Court stated:

> Far from engendering "absolute chaos and disastrous consequences" this Court's determination of the boundaries of the Uintah and Ouray Indian Reservation should simplify the administration of the law by resolving the nagging disputes that have marked the "jurisdictional history" of that area for years.

Id. at 1156-57. Fortunately, non-Indians and the Ute Tribe have made substantive efforts to cooperate and avoid confrontation as a result of the Tenth Circuit's decision on the issue. See, Ute Indian Tribe v. State of Utah, 773 F.2d 1087 (10th Cir. 1985). However, contrary to the District Court's ivory-tower conclusion, this amicus curiae has experienced and is experiencing troubling and expensive consequences as a result of the non-diminish-

ment boundary decision. Rather than simplify things, it has seriously complicated the administration of the law and created a cumbersome dilemma to businesses and industry in the area.

Roosevelt City is the primary commercial attraction to most of the area's Indian population. Local merchants, for the most part, have appreciated such patronage. However, such patronage and interaction since the boundary change has been the crux of many serious and litigious jurisdictional and law enforcement problems. Roosevelt City's Police Department (RPD) has eight police officers. Since the Tenth Circuit's decision and pursuant to local deputization agreements, the City receives some assistance from Duchesne County, Utah Highway Patrol, and the Bureau of Indian Affairs (BIA). However, RPD estimates that over half of its time is spent on arrests and apprehension incidents involving Indians, and over 80 percent of those are alcohol-related violations. Roosevelt City, for the safety and welfare of its citizens and all persons involved, must necessarily handle and respond to these matters without financial support and, much of the time, without consistent, reliable, and coordinated man-power support from the BIA or the Ute Tribe--whose law enforcement agencies are stationed in Fort Duchesne and concentrate their enforcement efforts only on Trust Land areas.

Extending the jurisdictional boundary over the City has created havoc in Roosevelt City's ability to enforce local and state laws involving Indians. Indians who commit crimes in Roosevelt City are delivered to the BIA and the Ute Tribe for processing. More often than not, however, such perpetrators are not prosecuted or seem to

fall through the cracks. Despite promises to the contrary, the U.S. Attorney's Office for Utah will not prosecute misdemeanors unless serious injury or death is involved.[13] A more serious problem involves those crimes committed by non-tribal or non-federally recognized Indians, more commonly referred to as Mixed-bloods.[14] A growing number of Uintah Mixed-bloods, not generally recognized as having the legal status as "Indians" and not accepted by the Ute Tribe or Federal prosecution systems, are challenging State and municipal jurisdiction over them, thereby creating a very litigious jurisdictional void.

Had the Reservation boundary remained in its diminished state as decided by the Utah Supreme Court in Perank, Roosevelt City would not be grappling with the overwhelming day-to-day quandary and years of expensive criminal and civil litigation of determining whether any one person is an Indian, for jurisdiction purposes. Coupled with the Federal Government's refusal and reluctance to get involved with those who are determined to be Indians, this problem will only magnify, unless the reservation boundary remains diminished. Placing Roosevelt City back within the historical boundaries of the Reservation has resulted in higher enforcement costs and increased man-hours for the City police; greater incidents

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[13] Even though a majority of cases involve minor offenses, serious injury or death cases are still numerous--nearly all being alcohol-related. Furthermore, whereas most incidents involve criminal violations, civil lawsuits brought by Tribal members against non-Tribal members is increasing dramatically.

[14] These people are former Ute Tribe members terminated pursuant to Congressional legislation--now commonly referred to as Uintah Mixed-bloods.

and risks of injury and harm to law enforcement personnel, suspects, and area residents; higher legal costs (both criminal and civil); and the fostering of distrust and racial barriers.

Tribal-member-owned and Indian-owned businesses refusing to comply with City, County and State business licensing and liquor-sales licensing requirements is another serious problem. Those who refuse to comply with local and state laws rely on business licenses issued by the Ute Tribe because the Tribe maintains that Roosevelt City lies within the Reservation boundaries. Such businesses routinely violate State and Federal laws governing the type of liquor sold and the manner in which it is sold, as well as statutorily mandated closing times. Although such violators are required to comply with State and local liquor laws, the Federal Government has the sole authority to enforce such laws.[15] And whereas the Federal Government refuses to enforce State and local laws, the natural consequence is Roosevelt City's lack of meaningful control over such businesses within the City and the overwhelming burden of increased drunk-driving and public intoxication violations, domestic fights, and public disturbances.

With some exceptions and until recently, the Ute Tribe has been relatively careful in asserting its jurisdictional powers over the non-Indian majority in order to assist in keeping the "status-quo" or an even-keel until the boundary issue is finally resolved. There are several exceptions, however, that show disparaging consequences to Roosevelt City.

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[15] See, Rice v. Rehner, 463 U.S. 713 (1983).

One problem is the recently passed Ute Tribe "Contracting Preference Ordinance". Ordinance No. 92-07, Uintah and Ouray Tribal Business Committee (Dec. 1, 1992). This ordinance requires any employer engaged in work or a business within the exterior boundaries of the reservation to give preference in awarding all contracts to Indian-owned businesses (emphasis added). Id. at 4. This ordinance is so broad and over-reaching that it threatens every facet of the local economy--from the largest oil company to the smallest yard-care entrepreneur. Non-compliance can result in very severe fines and penalties, including banning the employer from doing business on the reservation indefinitely. Id. at 9. It is apparent that the Ute Tribe, in an effort to assert its jurisdictional powers to guarantee jobs for its members, is actually creating a disincentive to non-Indian business and industry to invest, develop, and maintain the local economy.

Another similar problem, which is common with numerous Ute Tribal laws, is the Ute Indian Exclusion and Removal Code. Section 3-1-1, et seq., Ute Law and Order Code. This Tribal law provides for the exclusion or removal of persons or entities that the Tribe finds to be threatening or harmful to the Tribe or its members. For example, all persons who either do not own land, have a permanent domicile, or have permanent employment may be excluded or removed from all or any portion of the Reservation." Id. at Section 3-1-2. Therefore, all visitors, part-time workers, and non-landowners could be ousted from the Reservation. Similarly, this law provides for the exclusion or removal of any person "afflicted by a communicable or contagious disease." Id. at Section 3-1-3(6). Roosevelt City is home to the Duchesne County Hospital, which services the entire Uintah Valley area. Under this

strong-arm law, the Tribe could essentially ban people from acquiring medical treatment and prohibit the Hospital from providing essential services.

Another illustration is the disparity in State and Ute Tribe bail schedules for criminal law enforcement. Respective bail amounts for comparable criminal offenses under Utah State and Ute Tribe schedules are as follows: Driving Under the Influence of Alcohol, $1,110.00 versus $75.00; Possession of a Controlled Substance, $200.00 versus $25.00; and Aggravated Assault, $5,000.00 versus $75.00. The Ute Tribe's comparatively low bail amounts alone create a tremendous disparity in area law enforcement and have the net effect of repeated violations by Indians and the added burden on Roosevelt City's law enforcement efforts involving Indians or Tribal citizens.

Tribal members are afforded every possible opportunity to participate (and many do) in State and local functions, such as voting, running for office, jury duty, etc. However, the Ute Tribe does not reciprocate such privileges to non-Tribal members. If this Court decides against diminishment, the non-Indian population faces a political, legal, and constitutional nightmare. Not only does it translate to 15 percent of the population having overall jurisdictional authority over the remaining 85 percent, but also means the majority of the population has no voting rights, representation as to how they are governed, or guaranteed participation in Tribal government. It means another layer of government for non-Indians; and it means no realistic advance of tribal sovereignty or governance because Tribal members and Indians live primarily on Trust Lands. Furthermore, it means Roosevelt City and its residents, as well as the

County and State governing bodies, will continue to supply and fund public and private services and products to the Indian population without adequate compensation and financial support, and face inevitable years of litigation over governing and preemptive powers. It means non-Indian businesses and industry, if they choose to stay in business, must continue to invest and operate in a local economy which they have no representation, worthwhile control, or realistic expectations. Pressure to comply with Tribal laws will result in the reluctance of non-Indians and non-Indian businesses and industry to maintain, develop, and invest in the local economy and infrastructure.

Majority rule, voting rights, and political representation are basic principles of this democratic society. A decision from this Court against the diminishment of the historical Reservation boundary would be contrary to such principles and have a devastating effect on the non-Indians and their non-Trust homelands. A decision in favor of State v. Perank and diminishment would restore over eighty years of State and local autonomy and a greater incentive for business and industry to develop and maintain a viable local economy.

CONCLUSION

For the foregoing reasons, in addition to those points argued by the State of Utah and local Counties, amicus curiae Roosevelt City requests the Court to uphold the Utah Supreme Court's diminishment decision in State v. Perank, and reverse the U.S. Tenth Circuit's non-diminishment decision in Ute Indian Tribe v. State of Utah.

Respectfully submitted,

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UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

AREAS OF RESPONSIBILITY AND LAND STATUS MAP

STATE OF UTAH

Scale 1:1,000,000

Polyconic projection
Datum is mean sea level

LEGEND

- County seat
- City, town, or village
- Town boundary shown for towns over 2,500 population

Paved Highways
- Interstate Highway
- Federal or State Highway
- Other Major Highway
- Two Lane Paved

Unpaved Highways
- Improved Gravel (All Weather)
- Graded Dirt
- Ungraded Dirt or 4-Wheel Primitive

Road Symbols
- Interstate
- Federal
- State
- Interchange
- District Boundary
- District Office

- Public Lands
- State Land
- Private Land
- National Forest
- National Parks & Mon
- Military Res. & Wdls.
- Indian Land
- Wildlife Refuge

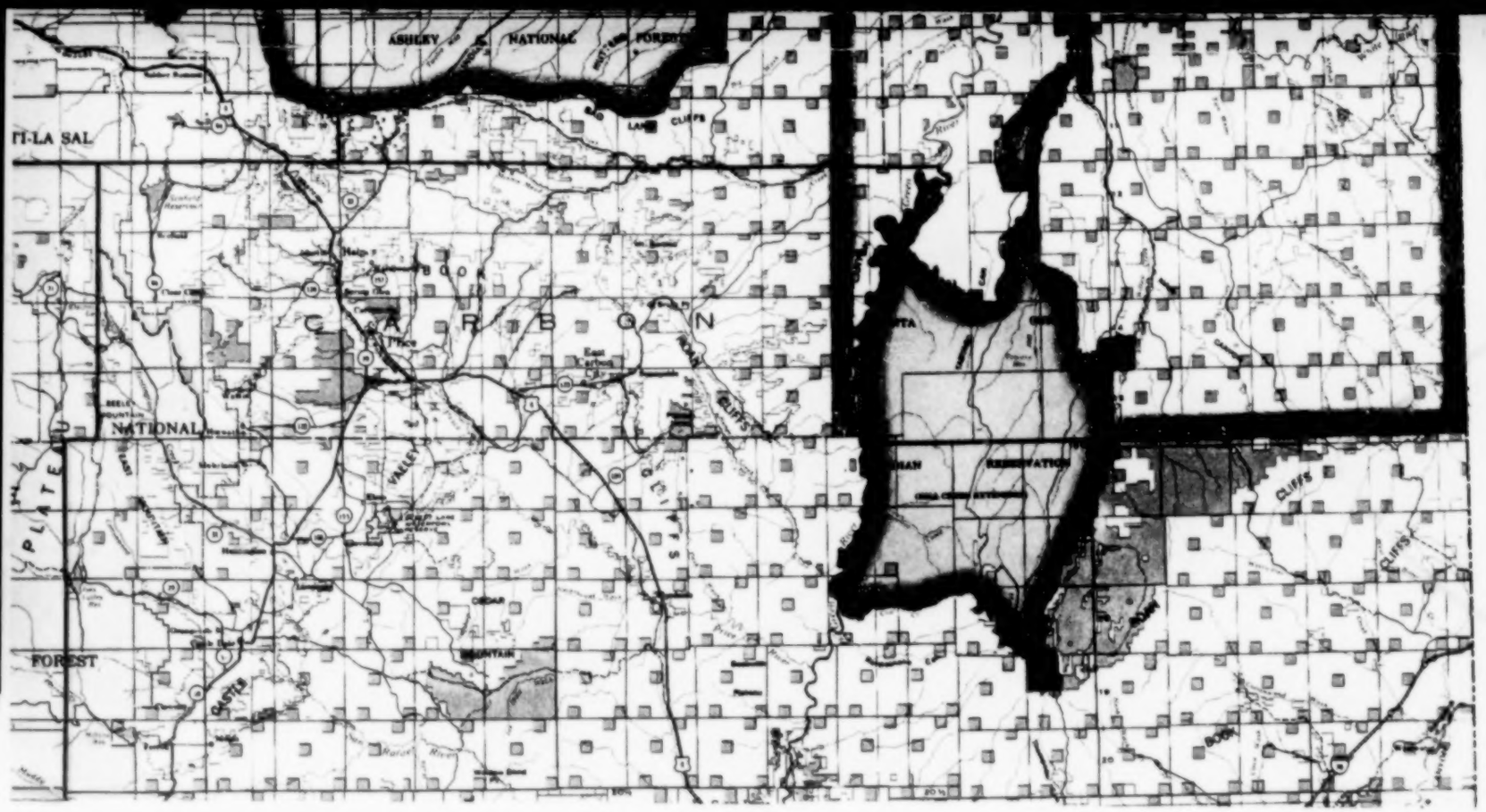
Status as of April 1, 1977

KEY

- ORIGINAL EXTERIOR BOUNDARY UINTAH VALLEY RESERVATION
- ORIGINAL EXTERIOR BOUNDARY UNCOMPAHGRE RESERVATION
- ORIGINAL EXTERIOR BOUNDARY HILL CREEK RESERVATION

W Y O M I N G

S U M M I T
WASATCH NATIONAL FOREST
ASHLEY NATIONAL FOREST
UINTA MOUNTAINS
UINTA
UINTAH AND OURAY
INDIAN RESERVATION
VERNAL DISTRICT
DUCHESNE
ASHLEY
WASATCH


ASHLEY NATIONAL
FOREST
TI-LA SAL
CARBON
NATIONAL
FOREST
PLATEAU
RESERVATION
CLIFFS
VALLEY
MOUNTAIN
CASTLE
R A D O